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March 15, 2016

**VIA ECF**

Honorable Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Widjaja et al. v. Kang Yue USA Corporation et al.*  
Civil Action No. 09-cv-02089-AMD-CLP**

Dear Judge Donnelly:

We represent Plaintiffs in the above-captioned matter. We write in response to Defendants' Letter to the Court earlier today seeking a Settlement Conference and/or a 30-day extension to oppose Plaintiffs' motion for attorneys' fees. Plaintiffs oppose both requests.

Defendants are plainly out of line disclosing inadmissible settlement communications to the Court. In any event, a Settlement Conference would be pointless. Plaintiffs already have a judgment in this case for \$20,481.45, and the only outstanding issue is Plaintiffs' attorneys' fees. If Defendants pay the amount of Plaintiffs' judgment in full by certified check, Plaintiffs' Counsel will discuss a settlement of their attorneys' fees, as I made clear to Defendants' Counsel. Until then, there is nothing to discuss.

With respect to Defendants' request for an extension of time to oppose the motion for attorneys' fees, Defendants offer no excuse for their failure to do so by today, a deadline imposed by Your Honor 15 days ago. To be sure, Defendants' Counsel spoke with me numerous times since the Court imposed the deadline and not once did he mention any need for extension. Your Honor's Individual Practices require requests for adjournment to be submitted over 48 hours before the deadline and to include whether or not the adversary consents. Defendants plainly ignored the Rules and, consistent with their general approach in this litigation, are now playing games to delay the inevitable. Defendants' request should be denied, and for the reasons detailed in Plaintiffs' moving papers, Plaintiffs' should be awarded \$39,522.50 in fees and \$522 in costs.

Respectfully submitted,

/s/ D. Maimon Kirschenbaum  
D. Maimon Kirschenbaum

Cc: Kevin K. Tung, Esq.